

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN THE MATTER OF:

IVAN FRANCISCO GONZALEZ CARMONA
DEBTOR(S)

CASE NUMBER: 08-01124 SEK

CHAPTER 13 (ASSET CASE)

DEBTOR'S MOTION UNDER SECTION 1329 OF THE BANKRUPTCY CODE

THE HONORABLE COURT:

COMES NOW, Debtor (s) through the undersigned attorney and respectfully ALLEGES and PRAYS:

1. That debtor (s) filed and circulated a MODIFIED PLAN to all parties in interest.
2. That the modification is based in that the Debtor (s) wants to amend their plan in order to:

a. Include provision for CRIM secured claim

3. Debtor (s) amend plan call for , twelve (12) payments of \$410.00, and forty eight (48)payments of \$ 600.00 for a total base of \$33,720.00 dollars with a provision for the payment of secured claim to CRIM.

WHEREFORE, Debtor (s) respectfully request from this Honorable Court to accept this motion and grant debtor (s) the opportunity to modify the confirmed plan according to 11 US 1329 and provide any other remedy it may deem appropriate.

NOTICE

"Parties in interest are notified they have twenty (20) days to reject a proposed modification of a plan and request a hearing. If no opposition is filed within the prescribed period of time, the Court will enter and order granting the motion upon the filing of a certificate of service by the movant that adequate notice was

given. Should and apposition be timely filed. The Court will schedule the motion for a hearing as a contested matter. Absent good cause, untimely rejections shall be denied".

In San Juan, Puerto Rico, this 30th, day of April, 2008.

I HEREBY CERTIFY: That I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: Chapter 13 Trustee **José R. Carrión, Esq.**, US Trustee **Monsita Lecaroz Arribas** and to all those who in this case have registered for receipt of notice by electronic mail and I hereby certify that I have mailed by regular mail to all creditors listed on the attached Master Address List.

RESPECTFULLY SUBMITTED.

/s/ Marilyn Valdes Ortega
MARILYN VALDES ORTEGA
USDC PR 214711
P.O. Box 19559
San Juan, PR 00919-5596
Tel. (787) 758-4400
Fax. (787) 763-0144
E-mail valdeslaw@prtc.net

United States Bankruptcy Court
District of Puerto Rico

IN RE:

GONZALEZ CARMONA, IVAN FRANCISCO

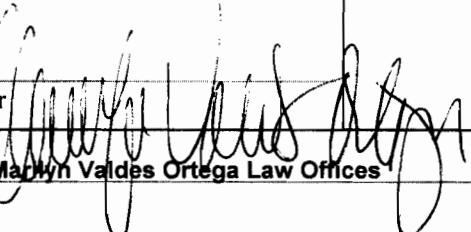
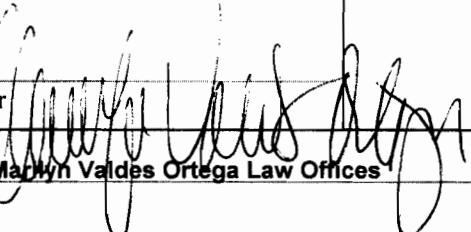
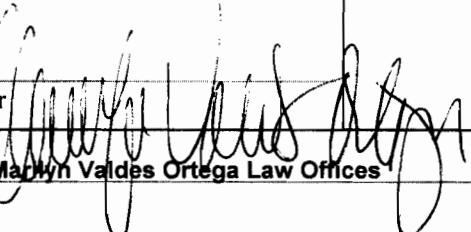
Debtor(s)

Case No. 08-01124 SEK

Chapter 13

CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee directly by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: _____	<input checked="" type="checkbox"/> AMENDED PLAN DATED: <u>9/30/2008</u>																																																																																																																																				
<input type="checkbox"/> PRE <input checked="" type="checkbox"/> POST-CONFIRMATION	Filed by: <input type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input checked="" type="checkbox"/> Other																																																																																																																																				
<table border="1"> <tr> <td colspan="2">I. PAYMENT PLAN SCHEDULE</td> <td colspan="2">II. DISBURSEMENT SCHEDULE</td> </tr> <tr> <td>\$ <u>410.00</u></td> <td>x <u>12</u> = \$ <u>4,920.00</u></td> <td colspan="2">A. ADEQUATE PROTECTION PAYMENTS OR \$ _____</td> </tr> <tr> <td>\$ <u>600.00</u></td> <td>x <u>48</u> = \$ <u>28,800.00</u></td> <td colspan="2">B. 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Attorney for Debtor: Marlyn Valdes Ortega Law Offices

Phone: (787) 758-4400

CHAPTER 13 PAYMENT PLAN
Continuation Sheet - Page 1 of 1

TRUSTEE TO PAY ATTORNEY'S FEES BEFORE ANY SECURED OR PRIORITY CREDITOR.

DEBTOR MAINTAINS PARTIAL DIRECT ALIMONY PAYMENTS IN FAVOR OF CECILIA GONZALEZ CONSISTING OF THE EXPENSES BOTH MEDICAL AND EDUCATIONAL AS WELL AS ALL THE NEEDS OF THE CHILD DURING DEBTOR'S VISITATION RIGHTS WHICH IS 182 DAYS OF THE YEAR.

ARREARS IN ALIMONY PAYMENT OF \$14,000.00 DOLLARS TO BE PAID BY THE TRUSTEE.

CONDITIONED TO THE OUTCOME OF THE REASSESSMENT/REDUCTION OF CHILD SUPPORT PAYMENT PENDING IN THE COURT OF INSTANCE OF SAN JUAN, ONCE A RULING IS MADE, DEBTOR WILL PROVIDE FOR ANY ARREARS SHOULD THAT BE THE CASE.

INSURANCE TO BANCO POPULAR OF PUERTO RICO AT END OF SALES CONTRACT IN THE APPROXIMATE AMOUNT OF \$300.00, THROUGH UNIVERSAL INSURANCE COMPANY, PAYMENTS TO UNIVERSAL TO BEGIN AT THE END OF THE SALES CONTRACT.

DEBT TO POPULAR AUTO TO BE PAID BEFORE MORTGAGE WITH BANCO POPULAR IN ORDER TO LOWER AUTO INSURANCE EXPENSES.

ADEQUATE PROTECTION PAYMENTS TO BANCO POPULAR ON AUTO LOAN THROUGH THE TRUSTEE ON A MONTHLY BASIS OF \$100.00 UNTIL CONFIRMATION.

SECURED DEBT WITH CRIM TO BE PAID BY THE TRUSTEE.

TRUSTEE TO PAY ALIMONY PRE-PETITION ARREARS \$10,000.00 AND POST PETITION ARREARS OF \$4,000.00 (MARCH AND APRIL 2008)

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE: *

IVAN FRANCISCO GONZALEZ CARMONA * CASE NUMBER 08-01124 SEK

*

Debtor(s) * CHAPTER 13 (ASSET CASE)

NOTICE OF FILING AMENDED PLAN
TO ALL THE CREDITORS LISTED ON THE ATTACHED
MASTER ADDRESS LIST

NOTICE IS HEREBY GIVEN THAT DEBTOR (S) FILED THE
ATTACHED PLAN ON SEPTEMBER 30, 2008

Parties in interest are hereby granted twenty (30) days from the date of notice to oppose the motion and request a hearing. If no opposition is filed within the prescribed period of time the Court will enter an order granting the motion upon the filing of a certificate by the movant that adequate notice was given. Should an opposition be timely filed, the Court will schedule the motion for a hearing as contested matter.

MARILYN VALDES ORTEGA
USDC PR 214711
P.O. BOX 195596
SAN JUAN, PR 00919-5596
Tel. (787) 758-4400
Fax. (787) 763-0144

In San Juan, Puerto Rico, this 30th, day of September, 2008.

I HEREBY CERTIFY: That I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: Chapter 13 Trustee **Jose R. Carrion, Esq.**, US Trustee **Monsita Lecaroz Arribas** and to all those who in this case have registered for receipt of notice by electronic mail and I hereby certify that I have mailed by regular mail to all creditors listed on the attached Master Address List.

RESPECTFULLY SUBMITTED.

/s/ Marilyn Valdes Ortega
MARILYN VALDES ORTEGA
USDC PR 214711
P.O. Box 19559
San Juan, PR 00919-5596
Tel. (787) 758-4400
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E-mail valdeslaw@prtc.net

Label Matrix for local noticing

0104-3

Case 08-01124-SEK13

District of Puerto Rico

Old San Juan

Tue Sep 30 16:42:06 AST 2008

US Bankruptcy Court District of P.R.

U.S. Post Office and Courthouse Building

300 Recinto Sur Street, Room 109

San Juan, PR 00901-1964

BANCO POPULAR PR
CARDONA JIMENEZ LAW OFFICES
PO BOX 9023593
SAN JUAN, PR 00902-3593

RECOVERY MANAGEMENT SYSTEMS CORP
25 SE 2ND AVENUE SUITE 1120
MIAMI, FL 33131-1605

AMERICAN EXPRESS
PO BOX 1270
NEWARK, NJ 07101-1270

American Express TRS Co, Inc Latin American
Division
c/o Becket and Lee LLP
POB 3001
Malvern PA 19355-0701

BANCO POPULAR DE PR
PO BOX 366818
SAN JUAN PUERTO RICO 00936-6818

BANCO POPULAR DE PR
PO BOX 70100
SAN JUAN, PR 00936-8100

BANCO POPULAR DE PUERTO RICO
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BANCO POPULAR PUERTO RICO
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SAN JUAN, PR 00936-2589

BANK OF AMERICA
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WILMINGTON, DE 19886-5102

CAROLA GARCIA LOPEZ
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SAN JUAN, PR 00902-2386

CAROLA GARCIA LOPEZ/CECILIA GONZALEZ GARCIA
PO BOX 9022386
SAN JUAN PR 00902-2386

CRIM
PO BOX 195387
SAN JUAN PR 00919-5387

DEPARTAMENTO DE HACIENDA
PO BOX 9024140
OFICINA 424 B
SAN JUAN, PR 00902-4140

DEPARTAMENTO DEL TRABAJO
AVE. MU?OZ RIVERA 505
HATO REY, PR 00918-3352

Department of Treasury
Bankruptcy Section (424-B)
PO Box 9024140
San Juan, PR 00902-4140

FEDERAL LITIGATION DEPT OF JUSTICE
PO BOX 9020192
SAN JUAN, PR 00902-0192

FIA Card Services aka Bank of America
by eCAST Settlement Corporation
as its agent
POB 35480
Newark NJ 07193-5480

FIRST BANK
BANKRUPTCY DIVISION
P O BOX 9146
SAN JUAN PR 00908-0146

FIRST BANK PUERTO RICO
FIA CARD SERVICES
PO BOX 15726
WILMINGTON, DE 19886-5726

FIRST BANK PUERTO RICO
PO BOX 9146
SAN JUAN, PR 00908-0146

ISABEL RODRIGUEZ BONET
PO BOX 19917
SAN JUAN, PR 00910-1917

(p) INTERNAL REVENUE SERVICE
CENTRALIZED INSOLVENCY OPERATIONS
PO BOX 21126
PHILADELPHIA PA 19114-0326

POPULAR AUTO
PO BOX 366818
SAN JUAN, PR 00936-6818

RADIO SHACK
PROCESSING CENTER
DES MOINES, IA 50364-0001

SCOTIABANK
PO BOX 362649
SAN JUAN, PR 00936-2649

UNIVERSAL INSURANCE
PO BOX 9023862
SAN JUAN, PR 00902-3862

CAROLA GARCIA LOPEZ
CALLE SOL 16
VIEJO SAN JUAN
SAN JUAN, PR 00926

IVAN FRANCISCO GONZALEZ CARMONA
PO BOX 9023195
SAN JUAN, PR 00902-3195

JOSE RAMON CARRION MORALES
PO BOX 9023884
SAN JUAN, PR 00902-3884

MARILYN VALDES ORTEGA
VALDES-ORTEGA
P O BOX 195596
SAN JUAN, PR 00919-5596

MONSITA LECAROZ ARRIBAS
OFFICE OF THE US TRUSTEE (UST)
OCHOA BUILDING
500 TANCA STREET SUITE 301
SAN JUAN, PR 00901-1938

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Internal Revenue Service	End of Label Matrix
Mercantil Plaza Bldg	Mailable recipients 33
2 Ponce de Leon Ave Suite 1014	Bypassed recipients 0
San Juan, PR 00918-1693	Total 33